

600 Tallevast Road, Suite 202, Sarasota, Florida 34243 | 941.234.0001 | www.star2star.com

## ANNUAL 47 C.F.R. §64.2009(e) CPNI CERTIFICATION FOR 2018 COVERING THE PRIOR CALENDAR YEAR 2017 EB DOCKET 06-36

Date filed: February 20, 2018

Name of company covered by this certification: Star2Star Communications, LLC

Form 499 Filer ID: 827907

Name of signatory: Bruce H. Illes

Title of signatory: Chief Legal Officer

Certification:

I, **Bruce H. Illes**, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's Customer Proprietary Network Information (CPNI) rules. *See* 47 C.F.R. § 64.2001 *et seq*.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company *has not* taken actions (*i.e.*, proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Star2Star Communications, LLC

Bruce H. Illes Chief Legal Officer

Attachments: Statement Accompanying CPNI Certification